

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Gateway Packaging, LLC for a  
Federally Enforceable State Operating Permit (FESOP) for  
#20 Central Industrial Drive  
Granite City, Illinois 62040

Site Identification No.: 119040ATD  
Application No.: 10040046

Illinois EPA Contacts

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## **I. INTRODUCTION**

Gateway Packaging, LLC has applied for a Federally Enforceable State Operating Permit (FESOP) for its printing and packaging manufacturing plant at #20 Central Industrial Drive in Granite City. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

## **II. SOURCE DESCRIPTION**

The Company operates lithographic printing presses, flexographic printing presses, laminating lines and bag forming machines. All operations are similar in that substrates are processed as a continuous web. Printing, laminating, and bag-making materials of paper or foil are loaded onto the rollers at the beginning of each production line. Inks are applied to the substrate, dried or cured in line by exposure to an energy source ( infra-red, ultraviolet, or electron beam) and then spooled onto rolls for removal from the production line. Laminating machines apply a layer of adhesive to join two substrates. Bag-making machines apply adhesives to the substrate only in specific locations on the substrates to produce the desired completed bag.

The inks, adhesives and solvents are applied to the substrates. Various organic materials are contained in the inks, adhesives and solvents. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated during the ink and adhesive application and from solvents usage. These materials also contain components that are considered hazardous air pollutants (HAPs).

## **III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source is seeking to operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

#### **IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for units emitting Volatile Organic Material in Madison County. The applicable rules for lithographic printing lines are found in 35 Ill. Adm. Code 219.407. These rules require low VOM contents for fountain solution and cleaning solution. Or in place of a low VOM content for cleaning solution, low vapor pressure cleaning solutions may be used. There is a National Emission Standard for Hazardous air pollutants (NESHAP) for flexographic printing 40 CFR 63 Subpart KK. This source has taken HAP usage limits to keep the source under major source levels for HAPs and is thus an area source. Area sources must maintain their usage limits and they are exempt from most of the requirements of the NESHAP. The application shows that the plant is in compliance with applicable state and federal emission standards.

#### **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

#### **VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.